

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

September 15, 2010

Carol Dove, Treasurer Nationwide Mutual Insurance Company Political Action Committee One Nationwide Plaza 1-27-10 Columbus, OH 43215

**Response Due Date:** October 20, 2010

Identification Number: C00076174

Reference:

July Monthly Report (6/1/10-6/30/10) and August Monthly Report

(7/1/10-7/31/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the reports referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following item:

-Commission Regulations require that a committee discloses identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (first name, middle name or initial, if available, and last name; initials for first and last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

Further, the attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information or clarify the information provided. If you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide/clarify the information or provide a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or bofore the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather

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than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Campaign Finance/Analyst

Reports Analysis Division

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## Inadequate Employer/Occupation Entries Nationwide Mutual Insurance Company Political Action Committee July Monthly Report (6/1/10-6/30/10)

Employer	Occupation
N2128	Director, Infrastructure Eng
N2121	AVP, Act Risk Segmentation
N2128	AVP, BSA EIP CCSBM
N2125	Director, IT Applications
N2128	AVP, Staff Administration
N0138	President NW Realty Inv Ltd
N2121	Strategic Consult, Sponsor Rel
N2128	SVP, NF Systems
N2125	NBH, Chief Specialty Hlth Offr
N52C3	AVP, Government Relations
N2121	VP, CFO, Nationwide Bank
N2121	AVP, Associate General Counsel
N2128	AVP, Process Management
N2121	VP, Product - NW Bank
N2128	AVP, IT Business Consulting
N0138	NRI Leader
N2128	AVP, Human Resources
N2128	AVP, IT Program Management
N2121	AVP, Bank Core Operations
N2128	AVP, Litigation-Discovery Unit
N2128	VP, Ch Health Care Strategist
N92N3	RVP, Mid West
NP108	SVP, NW Investment Offerings
N72B5	Regional Attorney
N2128	AVP, Application Owner
N2128	AVP, Application Infrastructure

## Inadequate Employer/Occupation Entries Nationwide Mutual Insurance Company Political Action Committee August Monthly Report (7/1/10-7/31/10)

Employer	Occupation
N0138	NRI Leader
N0138	President NW Realty Inv Ltd
N2121	AVP, Act Risk Segmentation
N2121	AVP, Associate General Counsel
N2121	AVP, Bank Core Operations
N2121	AVP, Process Management
N2121	Dir, Business Consult/Analysis
N2121	Strategic Consult, Sponsor Rel
N2121	VP, CFO, Nationwide Bank
N2121	VP, Product - NW Bank
N2121	VP, Sponsor Relations
N2125	Director, IT Applications
N2125	NBH, Chief Specialty Hlth Offr
N2128	AVP, BSA EIP CCSBM
N2128	AVP, Build Capability Leader
N2128	AVP, Human Resources
N2128	AVP, IT Business Consulting
N2128	AVP, IT Program Management
N2128	AVP, Litigation-Discovery Unit
N2128	AVP, Process Management
N2128	AVP, Special Investigations
N2128	AVP, Staff Administration
N2128	AVP, Application Infrastructure
N2128	Director, Infrastructure Eng
N2128	SVP, NF Systems
N2128	VP, IT Finance & SMS
N2275	AVP, IT Engineering
N2293	VP, Internet & Consumer Techno
N52C3	AVP, Government Relations
N52C3	Sr Govt Relations Director
N63B6	Property Special Claims Rep II
N63B7	AVP, EA Sales
N72B5	Regional Attorney
N92N3	RVP, Mid West
NP108	SVP, NW Investment Offerings